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5 Attorney for Material Witnesses
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (Magistrate Cathy A. Bencivengo))

11 UNITED STATES OF AMERICA,)	CASE NO. 08CR1191 DMS
)	08MJ1009
12 Plaintiff,)	
13 vs.)	DECLARATION OF THOMAS G. GILMORE
)	IN SUPPORT OF MOTION FOR
14 Angel Jose BERMUDEZ (D1))	VIDEOTAPE DEPOSITION AND
David PEREZ-Lemos (D2))	SUBSEQUENT VOLUNTARY DEPORTATION
)	OF MATERIAL WITNESSES
15)	
)	DATE: April 29, 2008
16 Defendants.)	TIME: 10:30 a.m.
)	PLACE: Courtroom of Magistrate
17)	Cathy A. Bencivengo

18 I, Thomas G. Gilmore declare:

19 I am an attorney duly licensed to practice before all the
20 courts of this State, District and Circuit, and am the attorney of
21 record for the material witnesses in the above action, Carlos DEL
22 MONTE-Palacios, Olegario NORIEGA-Gonzalez, and Rodrigo ANGULO-
23 Arzate.

24 I have personal knowledge of the facts set forth in this action
25 and could testify competently thereto if called.

26 My clients in this action have been in federal custody since
27 March 31, 2008 because they cannot locate anyone to post bond for
28 them, although efforts to obtain sureties continue.

1 My clients entered the United States to find work to support
2 family members at home in their country of origin. Each day they
3 remain in custody is an additional hardship on themselves and their
4 families.

5 Based on the above it respectfully requested that this motion
6 be granted, that said depositions take place at the earliest
7 possible time, and that my clients be allowed to voluntarily return
8 home to their country of origin immediately thereafter.

9 I declare under the penalty of perjury under the laws of the
10 State of California that the foregoing is true and correct of my own
11 personal knowledge except as to those matters stated to be based
12 upon information and belief and, as to those matters, I am informed
13 and believe that they are true and correct.

14 Executed this 18th day of April , 2008, in San Diego,
15 California.

16 /ss/ Thomas G. Gilmore
17 THOMAS G. GILMORE, Attorney for
18 Material Witnesses
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